



MEMO ENDORSED

United States Attorney
Southern District of New York

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

May 12, 2021

BY ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Randy Sargeant, 19 Cr. 666 (KMK)*

Dear Judge Karas:

I am writing on behalf of the parties to jointly request that the Court make a finding under Section 15002(b)(2)(A) of the CARES Act allowing a change-of-plea proceeding in the above-referenced case to be held remotely before the Magistrate Judge on duty. The defendant wishes to plead guilty and be sentenced in this matter so he can be promptly designated to a BOP facility, where he intends to participate in available job training and drug treatment. At present, the defendant is incarcerated at the Westchester County Jail, where no such programs are available. Due to the defendant's interest in accessing job training and drug treatment programs while serving his sentence in this case, the parties respectfully submit that the plea cannot be delayed without serious harm to the interests of justice.

Granted. Based on the proffer herein, the Court finds that Defendant's plea may proceed remotely, because delaying it for an in-person proceeding would do serious harm to the interests of justice under the CARES Act.

So Ordered.


5/12/21

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/ Christopher Brumwell
Christopher Brumwell
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Cc: Daniel Hochheiser, Esq.